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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ROSE DESIO,

Plaintiff,

vs.

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY; DOES I – V and
ROES VI – X, inclusive;

Defendants.

Case No.: 2:20-cv-01486-APG-NJK

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO FILE:**

**(1) REPLY IN SUPPORT OF
PLAINTIFF’S MOTION FOR
PARTIAL SUMMARY JUDGMENT
ON THE ISSUE OF INSURANCE
COVERAGE (ECF NO. 19);**

**(2) OPPOSITION TO DEFENDANT’S
COUNTER-MOTION FOR
SUMMARY JUDGMENT (ECF NO.
32); AND**

**(2) REPLY IN SUPPORT OF
DEFENDANT’S COUNTER-MOTION
FOR SUMMARY JUDGMENT (ECF
NO. 32)**

[Second Request]

PLAINTIFF ROSE DESIO (“Plaintiff”), by and through her counsel of record, JESSE SBAIH & ASSOCIATES, LTD., and DEFENDANT STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY (“Defendant”), by and through their counsel of record, the law firm of LEWIS BRISBOIS BISGAARD & SMITH LLP, hereby stipulate and agree to the following:

(1) Plaintiff’s Reply in Support of her Motion for Partial Summary Judgment on the Issue of Insurance Coverage (ECF No. 19), which is currently due on February 8, 2021, will be extended to **February 22, 2021;**

(2) Plaintiff's Opposition to Defendant's Counter-Motion for Summary Judgment (ECF No. 32), which is currently due on February 8, 2021, will be extended to **February 22, 2021**; and

(3) Defendant's Reply in Support of its Counter-Motion for Summary Judgment (ECF No. 32) will be extended to **March 8, 2021**.

Reason for Extension

The subject extensions are sought due to the complexities of the issues being addressed in the subject pleadings, Plaintiff counsel's recent indisposition, and to accommodate Plaintiff counsel's increased workload consisting of responding to numerous pleadings in a short time span. This is the second request for an extension and it is made in good faith and not for the purpose of delay.

DATED this 8th day of February, 2021.

DATED this 8th day of February, 2021.

JESSE SBAIH & ASSOCIATES, LTD.

LEWIS BRISBOIS BISGAARD & SMITH
LLP

/s/ Jesse M. Sbaih

/s/ Cheryl A. Grames

Jesse M. Sbaih, Esq.
JESSE SBAIH & ASSOCIATES, LTD
The District at Green Valley Ranch
170 South Green Valley Parkway, Suite 280
Henderson, Nevada 89012
Attorneys for Plaintiff

Robert W. Freeman, Esq.
Cheryl A. Grames, Esq.
Tara Teegarden, Esq.
LEWIS BRISBOIS BISGAARD & SMITH
LLP
6385 S. Rainbow Boulevard, Suite 600
Las Vegas, NV 89118
Attorneys for Defendant

ORDER

IT IS SO ORDERED.

Dated this 8th day of February, 2021.



U.S. DISTRICT COURT JUDGE

CERTIFICATE OF SERVICE

Pursuant to FRCP Rule 5(b), I certify that I am an employee of the law firm of Jesse Sbaih & Associates, Ltd., and that on this 8th day of February, 2021, I caused to be served **STIPULATION AND ORDER FOR EXTENSION OF TIME TO FILE: (1) REPLY IN SUPPORT OF PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT ON THE ISSUES OF INSURANCE COVERAGE (ECF NO. 19); (2) OPPOSITION TO DEFENDANT'S COUNTER-MOTION FOR SUMMARY JUDGMENT (ECF NO. 32); AND (2) REPLY IN SUPPORT OF DEFENDANT'S COUNTER-MOTION FOR SUMMARY JUDGMENT (ECF NO. 32)** via electronic service to the following:

Robert W. Freeman, Esq.
Cheryl A. Grames, Esq.
Tara U. Teegarden, Esq.
LEWIS BRISBOIS BISGAARD & SMITH LLP
6385 S. Rainbow Boulevard, Suite 600
Las Vegas, Nevada 89118
Robert.Freeman@lewisbrisbois.com
Cheryl.Grames@lewisbrisbois.com
Tara.Teegarden@lewisbrisbois.com
Attorneys for Defendant
State Farm Mutual Automobile Insurance Company

/s/ Jennifer Davidson
An employee of Jesse Sbaih & Associates, Ltd.

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Subject: RE: [EXT] Desio-SAO regarding briefing schedule

From: "Jesse Sbaih" <jsbaih@sbaihlaw.com>

Date: Mon, Feb 08, 2021 1:41 pm

To: "Grames, Cheryl" <Cheryl.Grames@lewisbrisbois.com>

Cc: "Ines Olevic" <iolevic@sbaihlaw.com>, "Jennifer Davidson" <jdavidson@sbaihlaw.com>

Attach: Logo_e6253148-26a1-47a9-b861-6ac0ff0bc3c4.png

Thank you! We'll proceed with filing.

Best regards,

Jesse M. Sbaih, Esq.
JESSE SBAIH & ASSOCIATES, LTD.
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----- Original Message -----

Subject: RE: [EXT] Desio-SAO regarding briefing schedule

From: "Grames, Cheryl" <Cheryl.Grames@lewisbrisbois.com>

Date: Mon, February 08, 2021 1:35 pm

To: Jesse Sbaih <jsbaih@sbaihlaw.com>

Cc: Ines Olevic <iolevic@sbaihlaw.com>, Jennifer Davidson
<jdavidson@sbaihlaw.com>

Hi Jesse, just one proposed revision – you have in your attorney box that you are counsel for the Relator. Otherwise, this is fine and you may use my e-signature.



Cheryl A. Grames
Partner
Cheryl.Grames@lewisbrisbois.com
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From: Jesse Sbaih <jsbaih@sbaihlaw.com>
Sent: Monday, February 8, 2021 1:09 PM
To: Grames, Cheryl <Cheryl.Grames@lewisbrisbois.com>
Cc: Ines Olevic <iolevic@sbaihlaw.com>; Jennifer Davidson <jdavidson@sbaihlaw.com>
Subject: [EXT] Desio-SAO regarding briefing schedule

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Hi Cheryl...I hope all is well. We appreciate your cooperation with extending the deadlines for us to file a Reply and Opposition.

Please advise if we have your consent to file the attached SAO with your e-signature.

Best regards,

Jesse M. Sbaih, Esq.
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